

Remarks

This is intended as a full and complete response to the Office Action dated August 9, 2006, having a shortened statutory period for response set to expire on November 9, 2006. Please reconsider the claims pending in the application for the reasons discussed below.

Claims 1-25 remain pending in the application and are shown above. Claims 1-25 stand rejected by the Examiner. Reconsideration of the rejected claims is requested for reasons presented below.

Claims 1, 10, 11, and 18 are amended to clarify the claimed subject matter. Claims 1, 10, 11, and 18 are amended to comprise the membrane support having a membrane engaging surface having a plurality of channels, slots, or bores. Support for the amendment may be found at least at Figures 3 and 4 and paragraphs [0019] and [0029]. These amendments are not presented to distinguish a reference, thus, the claims as amended are entitled to a full range of equivalents if not previously amended to distinguish a reference.

Claims 1-25 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. 2004/0016647 A1 to *Yang et al.* Applicants respectfully traverse the rejection.

Attached herewith are declarations of Michael X. Yang and Nicolay Y. Kovarsky, the inventors of *Yang et al.* and two of the inventors for the present invention, establishing that the relevant subject matter of *Yang et al.* has the same inventive entity as the pending claims. As may be seen from the declarations, *Yang et al.*, directed to a method, was invented by Michael X. Yang and Nicolay Y. Kovarsky. The present invention, directed to an electrochemical plating cell, was invented by Michael X. Yang, Dmitry Lubomirsky, Yezdi N. Dordi, Saravjeet Singh, Sheshraj L. Tulshibagwale, and Nicolay Y. Kovarsky. As well known to the Examiner, each claim in a patent application may have a different inventor (see M.P.E.P. § 2137.01, "A coinventor need not make a contribution to every claim of a patent. A contribution to one claim is enough"). Hence, it is not surprising that the inventors listed on *Yang et al.* are different from the inventors of the present invention because the presently claimed invention, which has not been

claimed in *Yang et al.*, is different from the invention claimed in *Yang et al.* Additionally, a petition is attached herewith claiming priority to *Yang et al.* Withdrawal of the rejection is respectfully requested.

Claims 1-9 and 11-25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0011415 A1 to *Hey et al.* in view of U.S. Patent No. 6,251,255 B1 to *Copping et al.* Applicants respectfully traverse the rejection.

Hey et al. and *Copping et al.* do not teach, show, or suggest an electrochemical plating cell comprising a membrane support having a membrane engaging surface having a plurality of channels, slots, or bores because *Hey et al.* and *Copping et al.* are silent regarding the presence of a membrane support as noted by the Examiner (see page 7 of the office action mailed August 9, 2006). Thus, because neither *Hey et al.* nor *Copping et al.* explicitly teaches, shows, or suggests a membrane support, the specific structure of the membrane support claimed would not be obvious. Therefore, *Hey et al.* and *Copping et al.*, alone or in combination, do not teach, show, or suggest an electrochemical plating cell comprising a membrane support having a membrane engaging surface having a plurality of channels, slots, or bores, as recited in claims 1, 11, and 18, and claims dependent thereon. Withdrawal of the rejection is respectfully requested.

Claim 10 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0011415 A1 to *Hey et al.* in view of U.S. Patent No. 6,251,255 B1 to *Copping et al.* and further in view of U.S. Patent Application Publication No. 2002/0189950 A1 to *Genders et al.* and Applicants' admitted prior art. Applicants respectfully traverse the rejection.

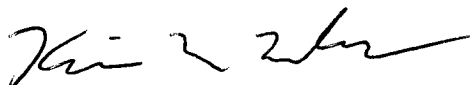
Hey et al., *Copping et al.*, *Genders et al.*, and any art admitted by Applicants do not teach, show, or suggest an electrochemical plating cell comprising a membrane support having a membrane engaging surface having a plurality of channels, slots, or bores because *Hey et al.* and *Copping et al.* are silent regarding the presence of a membrane support as noted by the Examiner (see page 7 of the office action mailed August 9, 2006). Thus, because neither *Hey et al.* nor *Copping et al.* explicitly teaches, shows, or suggests a membrane support, the specific structure of the membrane

support claimed would not be obvious. Therefore, *Hey et al.*, *Copping et al.*, *Genders et al.* and any art admitted by Applicants, alone or in combination, do not teach, show, or suggest an electrochemical plating cell comprising a membrane support having a membrane engaging surface having a plurality of channels, slots, or bores, as recited in claim 10. Withdrawal of the rejection is respectfully requested.

In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed.

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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